

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

BIRKENSTOCK US BIDCO, INC.;  
BIRKENSTOCK USA, LP; and  
BIRKENSTOCK IP GMBH,

Plaintiffs,

v.

WHITE MOUNTAIN INTERNATIONAL  
LLC; and AMERICAN EXCHANGE TIME  
LLC,

Defendants.

Civil Action No. 1:24-cv-10610

JURY TRIAL DEMANDED

**PLAINTIFFS' MOTION REQUESTING RE-DESIGNATION OF DEFENDANTS'  
DISCOVERY RESPONSE**

Pursuant to Paragraph 7.B. of the Court's Protective Order (Dkt. 35), and Local Rule 7.1(b), Plaintiffs Birkenstock US Bidco, Inc., Birkenstock USA, LP, and Birkenstock IP GmbH (collectively, "Birkenstock") hereby move this Court to order Defendants White Mountain International LLC and American Exchange Time LLC to re-designate as "Confidential" the information marked as "Highly Confidential - Attorneys' Eyes Only" in Defendants' Second Supplemental Response to Interrogatory No. 14, filed under seal, because that information is not properly designated as "Highly Confidential" under the Protective Order. For the reasons set forth in Birkenstock's concurrently filed Memorandum in Support of Plaintiffs' Motion Requesting Re-Designation of Defendants' Discovery Response, Birkenstock respectfully requests that this motion be granted.

**RULE 7.1 CERTIFICATION**

Plaintiffs hereby certify that prior to filing this motion, on April 4, 2025, counsel for Plaintiffs conferred with counsel for Defendants in a good-faith attempt to narrow or resolve the issue prompting this motion.

Dated: April 10, 2025

Respectfully submitted,

/s/ Cory C. Bell

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 10, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which automatically sends email notification of such filing to registered participants. Any other counsel of record will receive the foregoing via e-mail in PDF format:

/s/ Cory C. Bell  
Cory C. Bell